

Fill in this information to identify the case:

Debtor1 Dean L. Janas

Debtor 2 Susan G. Janas
(Spouse, if filing)

United States Bankruptcy Court for the : WESTERN District of Pennsylvania
(State)

Case number 13-24599-CMB

Form 4100R
Response to Notice of Final Cure (Amended)

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: Ditch Financial LLC f/k/a Green Tree Servicing

Court claim no. (if known): 4

Last 4 digits of any number you use to identify the debtor's account: 3341

Property address: 2026 CUTTER DR.
Number Street

MC KEES ROCKS, PA 15136

City State ZIP Code

Part 2: Prepetition Default Payments

Check one:

☒ Creditor agrees that the debtor(s) have paid in full amount required to cure the prepetition default on the creditor's claim

☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage

Check one:

☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on:

 / /
MM/DD/YYYY

☒ Creditor states that the debtors are not current on all postpetition payments consistent with § 1322 (b)(5) of the Bankruptcy Code, including all fees charges expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:

(a) \$2,104.60

b. Total suspense:

- (b) \$387.62

c. Total. Subtract lines a and b.

(c) \$1716.98

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

12 / 7 / 2018
MM/ DD/ YYYY

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☒ all payments received;
☒ all fees, costs, escrow, and expenses assessed to the mortgage; and
☒ all amounts the creditor contends remain unpaid

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim

Check the appropriate box:

- ☐ I am the creditor.
☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

X /s/ Lauren B. Karl
Signature

Date April 2, 2019

Print Lauren B. Karl
First Name Middle Name Last Name Title Authorized Agent

Company RAS Citron, LLC

If different from the notice address listed on the proof of claim to which this response applies:

Address PO Box 305
Number Street

Ingomar, PA 15127
City State ZIP Code

Contact 973-575-0707x340 Email lkarl@rascrane.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 2, 2019, the foregoing Amended Response to Notice of Final Cure Payment was electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and a true and correct copy has been served via CM/ECF or United States Mail to the following parties:

Kenneth Steidl, Esquire
Steidl & Steinberg
Suite 2830 Gulf Tower
707 Grant Street
Pittsburgh, PA 15219

Dean L. Janas
2026 Cutter Drive
Mc Kees Rocks, PA 15136

Susan G. Janas
2026 Cutter Drive
Mc Kees Rocks, PA 15136

Ronda J. Winnecour, Esquire
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219

Office of the United States Trustee
Liberty Center.
1001 Liberty Avenue, Suite 970
Pittsburgh, PA 15222

RAS CITRON, LLC

By: /s/Lauren B. Karl
Lauren B. Karl, Esquire
PA Id. 88209
P.O. Box 305
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973-575-0707x340
Email: lkarl@rascrane.com

